

# EXHIBIT A

STATE OF MICHIGAN  
IN THE 9<sup>th</sup> CIRCUIT COURT FOR THE COUNTY OF KALAMAZOO

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STRICJAVVAR STRICKLAND,  
JAZMONIQUE STRICKLAND, individuals,

Plaintiffs,

v.

Case No. 2023 - 0432 - C~~H~~  
Judge Curtis J. Bell

ADVANCE LOCAL MEDIA, LLC,  
dba MLIVE MEDIA GROUP and MLIVE,  
a New York foreign limited liability company,  
authorized to do business in Michigan,

Defendant.

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Strickjavar Strickland  
Jazmonique Strickland  
25165 NWY 35 N  
Raleigh, MS 39153  
In Pro Per  
Plaintiffs

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There is no other pending or resolved civil action arising  
out of the transaction or occurrence alleged in the complaint.

**COMPLAINT**

Plaintiff Stricjavvar Strickland and Jazmonique Strickland (“Plaintiffs”), in *Pro Per*, and for their Complaint against Advance Local Media, LLC dba MLive Media Group and/or MLive (“Defendant”) allege as follows:

1. Plaintiffs are citizens and residents of Smith County, Mississippi and were and are a married couple.
2. Defendant is a New York foreign limited liability company doing business in Michigan, including but not limited to Kalamazoo County, Michigan.
3. The incident complained of occurred in Kalamazoo County, Michigan, and Defendant, by way of its business, does business in Kalamazoo County, Michigan.
4. The amount in controversy exceeds \$25,000, exclusive of interest and costs.

### **Common Allegations**

6. On Tuesday, August 9, 2023, Plaintiff Stricjavvar Strickland pled guilty to one count of providing transportation services for the purposes of prostitution.
7. On Tuesday, August 9, 2023, Defendant published a news story on its website, [www.mlive.com](http://www.mlive.com), stating that Stricjavvar Strickland plead “guilty to human trafficking of a minor.”
8. Defendant’s new story was inaccurate. Defendant’s news story was inaccurate because Plaintiff Stricjavvar Strickland did not plead “guilty to human trafficking of a minor.” As indicated above, Plaintiff Stricjavvar Strickland plead guilty to one count of providing transportation services for the purposes of prostitution.
9. As a legal matter, a practical matter, and matter of degree, the crime of “human trafficking of a minor” is materially and substantially different than “providing transportation services for the purposes of prostitution.”
10. Shortly after August 9, 2023, Plaintiff Stricjavvar Strickland’s former attorney contacted Defendant and informed them of the inaccuracy of their news story.
11. Defendant has publicized its inaccurate article on the internet and social media platforms and despite Plaintiffs’ demands, has refused to retract its article.
12. As of the filing of this complaint, a new story entitled: “Strickjavvar ‘Strick’ Strickland pleads guilty to human trafficking of a minor.” See **Ex. A** – Article as of July 28, 2023.

### **Count I**

#### **Defamation**

13. Plaintiffs incorporate by reference paragraphs 1 through 12.
14. The accusations that Plaintiff pled “guilty to human trafficking of a minor” is false.
15. Defendant published the remarks to third parties with knowledge of the falsity of the statements or in reckless disregard of their truth or falsity.
16. The publication was not privileged.
17. The publication of these remarks has resulted in damage to Plaintiff’s reputation in the community and economic loss, including but not limited to emotional distress, humiliation, mortification, and embarrassment, sleeplessness and anxiety and other damages that may arise during the course of discovery and the course of this trial.
18. Defendant’s accusations were defamation per se.

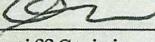
**Count II**  
**Intentional Infliction of Emotional Distress**

19. Plaintiffs incorporate by reference paragraphs 1 through 18.
20. Defendant's conduct as outlined above was intentional.
21. Defendant's conduct as outlined above was extreme, outrageous, and of a character not to be tolerated by a civilized society.
22. Defendant's conduct as outlined above was for an ulterior motive or purpose.
23. Defendant's conduct resulted in severe and serious emotional distress.
24. As a direct and proximate result of Defendant's conduct, Plaintiffs have been damaged in the manner outlined above.

PLAINTIFFS REQUEST that this court enter judgment in their favor against Defendant in whatever amount Plaintiffs are found to be entitled, together with costs and interest.

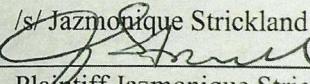
Respectfully submitted,

/s/ Stricjavvar Strickland

  
\_\_\_\_\_  
Plaintiff Stricjavvar Strickland

Date: 8/3/2023

/s/ Jazmonique Strickland

  
\_\_\_\_\_  
Plaintiff Jazmonique Strickland

Date: 8/3/2023

This document was drafted or partially drafted with the assistance of a lawyer licensed to practice in the State of Michigan, pursuant to MRPC 1.2(b). The filing of this document is not, and shall not be deemed, an appearance by the lawyer in the case. MRPC 1.2(b)(2).

# EXHIBIT A



Subscribe

## Stricjavvar “Strick” Strickland pleads guilty to human trafficking of a minor

By [Joel Bissell | jbissell@mlive.com](mailto:Joel.Bissell@mlive.com)



Joel Bissell

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### Stricjavvar “Strick” Strickland

Stricjavvar “Strick” Strickland pleads guilty via video conferencing in front of Circuit Court Judge Paul Bridenstine at the Kalamazoo County Courthouse in Kalamazoo, Michigan on Tuesday, Aug. 9, 2022. Strickland pleaded guilty to transportation services for the purpose of engaging in prostitution. (Joel Bissell | MLive.com) [GET PHOTO](#)



Joel Bissell

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### **Stricjavvar “Strick” Strickland**

Michael Hills, attorney for Stricjavvar “Strick” Strickland, listens as he pleads guilty in front of Circuit Court Judge Paul Bridenstine at the Kalamazoo County Courthouse in Kalamazoo, Michigan on Tuesday, Aug. 9, 2022. Strickland pleaded guilty to transportation services for the purpose of engaging in prostitution. (Joel Bissell | MLive.com) [GET PHOTO](#)



Joel Bissell

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Joel Bissell

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Joel Bissell

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### Stricjavvar "Strick" Strickland

Circuit Court Judge Paul Bridenstine reads the plea agreement to Stricjavvar "Strick" Strickland at the Kalamazoo County Courthouse in Kalamazoo, Michigan on Tuesday, Aug. 9, 2022. Strickland pleaded guilty to transportation services for the purpose of engaging in prostitution. (Joel Bissell | MLive.com) [GET PHOTO](#)

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Curtis J. Bell

Defendant.

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Strickjavar Strickland  
Jazmonique Strickland  
25165 NWY 35 N  
Raleigh, MS 39153  
In Pro Per  
Plaintiffs

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**JURY DEMAND**

Plaintiffs respectfully request a jury trial.

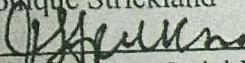
Date: August 3, 2023

/s/ Stricjavvar Strickland

  
Plaintiff Stricjavvar Strickland

Date: August 3, 2023

/s/ Jazmonique Strickland

  
Plaintiff Jazmonique Strickland

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